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Attorneys for Plaintiff, STACEY ORTEGA

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA – SAN JOSE DIVISION**

STACEY ORTEGA,

Plaintiff,

vs.

EDISON PATRICK & ASSOCIATES,

Defendant.

) **Case No.: 5:11-cv-00456-EJD**

) **PLAINTIFF’S REQUEST TO APPEAR**

) **TELEPHONICALLY AT CASE**

) **MANAGEMENT CONFERENCE RESET**

) **TO JULY 1, 2011**

Ryan Lee, counsel for Plaintiff, STACEY ORTEGA, respectfully requests this Honorable Court allow his telephonic appearance for the Case Management Conference hearing scheduled for July 1, 2011 at 10:00 AM.

Counsel’s office is located in Los Angeles, California and appearing by telephone will avoid the significant time and resources needed to secure travel and appearance for the present hearing. Further, as the statutes for which Plaintiff seeks relief under (FDCPA and RFDCPA) contains a “fee-shifting” provision, allowing Plaintiff to avoid the significant costs and expenses of securing travel from Los Angeles, CA to San Jose, CA will allow the parties to work towards a mutual resolution of the case without a significant increase in the Plaintiff’s attorneys’ fees and costs and thus making informal resolution more likely.

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2 RESPECTFULLY SUBMITTED,  
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4 DATED: July 24, 2010

KROHN & MOSS, LTD.

5 By: /s/ Ryan Lee  
6 Ryan Lee  
7 Attorneys for Plaintiff  
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10 **CERTIFICATE OF SERVICE BY MAIL**  
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12 I, Ryan Lee, an attorney, certify that I served a copy of Plaintiff's Request to Appear  
13 Telephonically to the Case Management Conference to the following address by FIRST CLASS  
14 MAIL:

15 Edison, Patrick & Associates  
16 4446-1A HENDRICKS AVENUE  
17 SUITE 375  
JACKSONVILLE FL 32207

18 Dated: June 24, 2011

/s/ Ryan Lee  
19 Ryan Lee  
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